1 Michael C. Fallon, SBN 088313 Michael C. Fallon, Jr., SBN 303082 2 100 E Street, Suite 219 Santa Rosa, California 95404 3 T: (707) 546-6770 F: (707) 546-5775 4 E: mcfallon@fallonlaw.net fallonmc@fallonlaw.net 5 Attorneys for Debtor 6 7 UNITED STATES BANKRUPTCY COURT 8 NORTHERN DISTRICT OF CALIFORNIA 9 10 In Re: Case No. 25-10088 WJL 11 Kingsborough Atlas Tree Surgery, Inc. Chapter 11 12 Debtor. Date: June 3, 2025 Time: 9:30 am 13 Ctrm: U.S. Bankruptcy Court, Room 220 Oakland, California 94612 14 or by Zoom 15 STATUS CONFERENCE STATEMENT 16 The Debtor reported at the initial Status Conference that it intended to liquidate its 17 equipment, pay the purchase money lenders and pay down the blanket lien on all of the 18 equipment that secures the claim of Commercial Credit Group, with the balance of the sale 19 proceeds to pay creditor claims. Three sales have been approved; four proposed sales are 20 contested by Anvil Builders with the objections to be resolved at the continued hearing on June 21 3rd. 22 Since the last hearing, the Complaint brought by the Debtor in the State Court against 23 Anvil Builders for breach of contract, as well as other claims, has been removed to this court. 24 Debtor will file its plan not later than 120 days from the petition date that will propose 25 to continue the sale of its equipment and to continue with the litigation against Anvil Builders. 26 Respectfully submitted. 27 Dated: May 28, 2025 <u>/s/ Michael C. Fallon</u> 28 Michael C. Fallon

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